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March 22, 2024

Via ECF

Hon. Gary Stein
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Bruno v. Beard et al.*, Case No. 1:24-cv-00798-JGLC-GS

Dear Judge Stein:

Enclosed please find a Stipulation and Proposed Order by and between plaintiff Glenn Bruno, (“Plaintiff”), Gregory A. Beard, William B. Spence, Sarah P. James, Thomas J. Pacchia, Matthew J. Smith, Thomas R. Trowbridge, IV, and Ricardo R. A. Larroudé (the “Individual Defendants”) and nominal defendant Stronghold Digital Mining, Inc. (“Stronghold,” and together with the Individual Defendants, “Defendants”) providing that Defendants’ time to answer, move or otherwise respond to the Complaint in the above-referenced action be stayed pending a ruling on whether this action should be consolidated with *In re Stronghold Digital Mining, Inc. Stockholder Derivative Litigation*, Case No. 1:23-cv-07840-RA-GS.

Pursuant to Rule I(G) of this Court’s Individual Rules and Practices in Civil Cases, Defendants note that their current deadline to answer, move, or otherwise respond to the complaint is currently set for April 8, 2024. This is the parties’ first request for an adjournment or extension of time in this action. All parties consent to the requested stay.

Defendants respectfully request that the Court enter the Stipulation and Proposed Order.



Respectfully submitted,

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